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Attorneys for Defendants,
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

VENUS M. BOBADILLA, individually and as
Guardian ad Litem of ZAVANNAH
BOBADILLA, a minor, and FLOREMLISA N.
MONTANO,

Plaintiffs,

vs.

ROBERT W. SORENSEN; L&N
TRANSPORT, INC.; DOES 1 through 5, and
ROE BUSINESS ENTITIES 1 through 5,
inclusive,

Defendants.

Case No.: 2:14-cv-1233-JAD-CWH

AMENDED
STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(First Request)

26238

IT IS HEREBY STIPULATED by and between Plaintiffs, VENUS M. BOBADILLA,
individually and as Guardian ad Litem of ZAVANNAH BOBADILLA, a minor, and
FLOREMLISA N. MONTANO, and Defendants, ROBERT W. SORENSEN and L&N
TRANSPORT, Inc., by and through their respective counsel of record, pursuant to EDCR 2.35
that due to a typographical error in the Stipulation and Order to Extend Discovery Deadlines
(First Request) [12], the date for the Rebuttal Expert Designations should be amended as follows
(**amended information appears in bold**):

1 1. Summary of Discovery Completed

2 All parties have provided initial witness lists and documents pursuant to N.R.C.P. 16.1 as
 3 well as supplements thereto. Defendants have served written discovery requests to all Plaintiffs,
 4 all of whom have served responses thereto. Depositions of eyewitness, Michael Penosa, and
 5 Plaintiff, Venus Bobadilla, individually and as Guardian ad Litem for Zavannah Bobadilla, have
 6 been taken.

7 2. Discovery Remaining

8 Depositions of Plaintiff, Floremliza N. Montano, Plaintiffs' treating physicians and the
 9 parties' expert witnesses (once they are disclosed) need to be taken.

10 3. Reason Why Discovery Was Not Completed

11 At the time of the filing of this Stipulation, no discovery deadlines have passed. However, the
 12 parties have scheduled a mediation with Honorable Gene Porter [Retired] for January 5, 2015
 13 and wish to extend discovery deadlines by 60 days to allow time for settlement negotiations to
 14 take place. The 60-day extension will allow the parties to avoid incurring the additional expense
 15 of expert witnesses designations prior to the mediation in the event that settlement is reached.
 16 Additionally, the parties believe that expert expenses will render settlement at the January 5,
 17 2015 mediation more difficult to reach.

18 4. A Proposed Schedule for Completing Discovery

19 Accordingly, the parties respectfully request that this Court enter an order setting the
 20 following discovery plan and scheduling order dates:

Event	Former Deadline	New Deadline
Discovery cutoff	February 24, 2015	April 24, 2015
Motions to amend pleadings and add parties	November 6, 2014	January 6, 2015
Expert Designations	December 26, 2014	February 26, 2015
Rebuttal expert designations	January 26, 2015	March 30, 2015
Interim status report	December 26, 2014	February 26, 2015

Dispositive motions

March 26, 2015

May 26, 2015

Dated this 2nd day of December, 2014.

Dated this 2nd day of December, 2014.

BENSON & BINGHAM

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*Attorneys for Defendants***ORDER**

Based upon the foregoing Stipulation of the parties hereto, and good cause appearing therefore,

IT IS HEREBY ORDERED that the discovery deadlines in the above entitled matter shall be Amended with respect to the Rebuttal Expert extended as set forth above.

IT IS SO ORDERED.

DATED this 12th day of December, 2014.


United States Magistrate Judge